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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANT OTTO TRUCKING LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
MOTION FOR A SEPARATE TRIAL**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking LLC’s Administrative  
7 Motion to File Under Seal Portions of Its Motion for a Separate Trial (the “Administrative Motion”).  
8 The Administrative Motion seeks an order sealing highlighted portions of Otto Trucking’s Motion for  
9 a Separate Trial (“Otto Trucking’s Motion”), as well as the entirety of Exhibits 1 and 3 to the  
10 Chatterjee Declaration.

11 3. The entirety of Exhibit 3 contains or refers to trade secret information, which Waymo  
12 seeks to seal.

13 4. Exhibit 3 (entire document) contains, references, and/or describes Waymo’s asserted  
14 trade secrets or information that, from context, tends to disclose Waymo’s asserted secrets. The  
15 information Waymo seeks to seal includes the confidential design and functionality of Waymo’s  
16 proprietary autonomous vehicle system, including its LiDAR designs, which Waymo maintains as  
17 secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that  
18 the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The public disclosure of this  
19 information would give Waymo’s competitors access to descriptions of the functionality or features of  
20 Waymo’s autonomous vehicle system. If such information were made public, I understand that  
21 Waymo’s competitive standing would be significantly harmed.

22 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibit 3 that merit  
23 sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on October 2, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC  
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.  
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12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven  
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